

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-mc-00353 (LJL)

No. 24-cv-6563 (LJL)

**MOTION FOR LEAVE TO SERVE RYAN MEDRANO BY ALTERNATIVE MEANS  
AND FOR EX PARTE CONSIDERATION AND DECISION OF THIS MOTION**

PLEASE TAKE NOTICE, that Plaintiffs Ruby Freeman and Wandrea' Moss ("Plaintiffs"), pursuant to Local Civil Rule 6.1(d), New York Civil Practice Law and Rules §§ 308(1)–(5), Federal Rule of Civil Procedure 4(e)(1), (2), and upon the memorandum in support of this motion and supporting papers, (1) move this Court for entry of an order permitting Plaintiffs to serve Mr. Ryan Medrano with copies of the Motion to Compel (No. 24-mc-353, ECF No. 113) the Order (No. 24-mc-353, ECF No. 116), and a Rule 45 Subpoena via the alternative methods listed in the motion and (2) that this Court grant this Motion on an expedited basis and without awaiting a response from Mr. Medrano.

Respectfully submitted,

Dated: November 20, 2024  
New York, New York

/s/ Aaron E. Nathan  
Aaron E. Nathan

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